

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: NATIONAL BROKERS OF AMERICA, INC.	Bankruptcy No. 19-15488-pmm
	Chapter 7.

MOTION TO REQUEST CONTINUATION OF HEARING/TRIAL UNDER FEDERAL RULES OF BANKRUPTCY PROCEDURE 9013 AND 9014

Jason Scott Jordan, Joel A. Ready, Esquire (incorrectly named “Joel Reedy” by Debtor), and Cornerstone Law Firm, LLC (the “Creditors”) hereby requests to continue the hearing set for July 2, 2024, under Fed. R. Bankr. P. 9013 and 9014. The reasons for this request are as follows:

1. Counsel for the Creditors are Joel A. Ready and Daniel Hong.
2. Counsel Joel A. Ready has a scheduling conflict on July 2, 2024, which requires his appearance for a scheduled hearing. Please see Exhibit “A.”
3. Mr. Ready’s law firm, Cornerstone Law Firm, LLC, is a party to the hearing which may require his presence.
4. Mr. Ready is also a party to the hearing which may require his presence at the date of the hearing.
5. Bankruptcy matters with Debtor date back to 2019 and further matters litigated under state law date back to 2014.
6. Mr. Ready has been involved in the state matters for years and has knowledge pertaining to the facts and law of the proceedings which may require his presence.

WHEREFORE, based on the foregoing, the Creditors request the Court grant the Motion to request a continuance of the hearing/trial under Fed. R. Bankr. P. 9013 and 9014; and such other relief as the Court deems necessary, just, or appropriate.

Respectfully submitted

CORNERSTONE LAW FIRM, LLC

Dated: June 27, 2024

By: /s/ Daniel Hong
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